FILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM

NYSCEF DOC. NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 INDEX NO. 190258/2019

Page 1 of 17 RECEIVED NYSCEF: 10/08/2019

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

ARNOLD PRITT and RUTH ANN PRITT,

Plaintiffs,

-against-

AERCO INTERNATIONAL, INC.,

ALFA LAVAL, INC.,

ARMSTRONG INTERNATIONAL, INC.,

ATWOOD & MORRILL COMPANY,

AURORA PUMP COMPANY,

BMCE INC.,

f/k/a UNITED CENTRIFUGAL PUMP,

BORG-WARNER MORSE TEC LLC,

BRIGGS & STRATTON CORP.,

BW/IP INC., AND ITS WHOLLY OWNED SUBSIDIARIES,

BYRON JACKSON PUMPS.

CARRIER CORPORATION,

DAP, INC.,

EATON CORPORATION, as successor in interest to

CUTLER-HAMMER, INC.,

ELECTROLUX HOME PRODUCTS, INC.,

individually, and as successor to Tappan and Copes-Vulcan,

FLOWSERVE US, INC.,

solely as Successor to Rockwell Manufacturing Company,

Edward Valve, Inc., Durco Pumps, Durametallic, and Nordstrom

Valves, Inc.

FMC CORPORATION, individually,

and as successor to CHICAGO PUMP COMPANY,

NORTHERN PUMP COMPANY,

and PEERLESS PUMP COMPANY,

FORT KENT HOLDINGS, INC.,

f/k/a DUNHAM-BUSH, INC.,

GARDNER DENVER, INC.,

GOOD YEAR CANADA, INC.,

GOODYEAR TIRE & RUBBER COMPANY (THE),

GOULD ELECTRONICS, INC.,

GOULDS PUMPS, INC.,

GRINNELL LLC,

HONEYWELL INTERNATIONAL, INC.,

f/k/a ALLIED SIGNAL, INC. / BENDIX,

IMO INDUSTRIES, INC.,

INGERSOLL-RAND COMPANY,

ITT CORPORATION, individually,

and as successor in interest to BELL & GOSSETT, and as successor in interest to HOFFMAN SPECIALTY,

JOHN CRANE, INC.,

KOHLER CO.,

LAMONS GASKET COMPANY,

McCORD CORPORATION,

Index No.:

Date Filed: 10/8/2019

Plaintiff Designates

NEW YORK

County as the Place of

Trial

The Basis of Venue is

Plaintiffs' Place of

Exposure

SUMMONS

ILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

EF DOC. NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page 2 of 17 NYSCEF: 10/08/2019

MINNESOTA MINING & MANUFACTURING COMPANY. a/k/a 3M COMPANY, MUELLER STEAM SPECIALTY CO., INC.; NASH ENGINEERING COMPANY (THE), ROBERTSHAW CONTROLS COMPANY, Individually, and as successor to FULTON SYLPHON COMPANY, ROCKWELL AUTOMATION, INC., as successor by merger to ALLEN-BRADLEY COMPANY, LLC, SAINT GOBAIN ABRASIVES, INC., Individually and as Successor in Interest to CARBORUNDUM, SCHNEIDER ELECTRIC USA, INC., formerly known as SQUARE D COMPANY, SPIRAX SARCO, INC. individually and as successor to SARCO COMPANY. STRAHMAN VALVES, INC., TRANE U.S. INC., f/k/a AMERICAN STANDARD INC., UNION CARBIDE CORPORATION, VELAN VALVE CORPORATION, WARREN PUMPS LLC., YORK INTERNATIONAL CORPORATION, as Successor in Interest to YORK CORPORATION.

Defendants. -----X

You are hereby summoned to answer the verified complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated, October 8, 2019

New York, New York

MEIROWITZ & WASSERBERG, LLP

Defendant's address:

Defendant's address:

SEE ATTACHED DEFENDANTS RIDER

/S/ Daniel Wasserberg

Daniel Wasserberg, Esq. Attorney for Plaintiff Post Office Address: 535 Fifth Ave, 23rd Floor New York, New York 10017 (212) 897-1988

10/08/2019 04:40 10/08/2019 04:40 PM Document 1-2 Filed 11/18/19 COUNTY CLERK YORK Case 1:19-cv-10651-KPF

INDEX NO. 190258/2019

Page 3 of 17 RECEIVED NYSCEF: 10/08/2019

DEFENDANTS' RIDER

AERCO INTERNATIONAL, INC.,

100 Oritani Drive Blauvelt, NY 10913

ALFA LAVAL, INC.,

C T Corporation System 28 Liberty St.

New York, New York, 10005

ARMSTRONG INTERNATIONAL, INC.

900 Maple Street Three Rivers, MI 49093

ATWOOD & MORRILL COMPANY

29 Old Right Road Ipswich, MA 01938

AURORA PUMP COMPANY

13320 Ballantyne Corporate Place Charlotte, NC 28277

BMCE INC., f/k/a UNITED CENTRIFUGAL PUMP

Marshall Dennehy Anna M. DiLonardo 105 Maxess Rd. Suite 303 Melville, NY 11747

BORGWARNER MORSE TEC LLC

CT Corporation 1209 Orange Street Wilmington, Delaware 19801

BRIGGS & STRATTON CORP.

12301 W Wirth Street Wauwatosa, WI 53222

BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES; BYRON JACKSON PUMPS

5215 N. O'Conner Boulevard, Suite 2300 Irving, TX 75039

CARRIER CORPORATION

C T Corporation System 28 Liberty St. New York, New York, 10005

DAP, INC.

2400 Boston Street, Suite 200 Baltimore, MD 21224

EATON CORPORATION, as successor in interest to CUTLER HAMMER, INC.

CT Corporation 28 Liberty Street New York, NY 10005

ELECTROLUX HOME PRODUCTS, INC.

Individually, and as Successor to Tappan and Copes-Vulcan 20445 Emerald Parkway, Cleveland, OH 44135

FLOWSERVE US, INC. Solely as Successor to Rockwell Manufacturing Company, Edward Valve, Inc., Durco Pumps. Durametallic, Nordstrom Valves, Inc.,

CT Corporation 28 Liberty Street New York, NY 10005

FMC CORPORATION, individually, and as successor to CHICAGO PUMP COMPANY, NORTHERN PUMP COMPANY, and PEERLESS PUMP COMPANY,

CT Corporation System 101 Federal Street Boston, MA 02110

FORT KENT HOLDINGS, INC., FORMERLY KNOWN AS **DUNHAM-BUSH, INC.**

Peter C. Langenus, Esq. Schnader Harrison Segal & Lewis LLP 140 Broadway, Suite 3100 New York, NY 10005

GARDNER DENVER, INC.

1800 Gardner Expressway Quincy, IL 62301

GOODYEAR CANADA, INC.

450 Kipling Ave Atobicoke, Ontario CANADA M8ZSE1

GOODYEAR TIRE & RUBBER COMPANY (THE)

Corporation Service Company 80 State Street Atlanta, GA 30303

GOULD ELECTRONICS, INC.,

CT Corporation 1300 E. 9th Street Cleveland, OH 44114

GOULDS PUMPS, INC.

2881 E. Bayard Street Seneca Falls, NY 13148

GRINNELL LLC

CT Corporation 28 Liberty Street New York, NY 10005

HONEYWELL INTERNATIONAL, INC., f/k/a ALLIED SIGNAL, INC. / BENDIX 115 Tabor Road,

Morris Plains, NJ 07950 IMO INDUSTRIES, INC. The Corporation Trust Company 1209 North Orange Street Wilmington, DE 19801

INGERSOLL-RAND COMPANY

c/o Illinois Corporation Service Co 801 Adlai Stevenson Drive, Springfield, IL 62703

ITT CORPORATION, Individually, and as successor to BELL & GOSSETT COMPANY, and as successor in interest to HOFFMAN SPECIALTY,

CT Corporation 28 Liberty Street New York, NY 10005

JOHN CRANE, INC.

CT Corporation 28 Liberty Street New York, NY 10005

KOHLER CO.

HOAGLAND, LONGO, MORAN, DUNST, & DOUKAS, LLP Marc S. Gaffrey, Esq. 40 Patterson Street New Brunswick, NJ 08903

YORK COUNTY CLERK 10/08/2019 04:40 PM 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 INDEX NO. 190258/2019 YORK

Page 4 of 17 RECEIVED NYSCEF: 10/08/2019

LAMONS GASKET COMPANY

Corporation Service Company 211 E. 7th Street, Ste 620 Austin, TX 78701

McCORD CORPORATION

The Corporation Company 30600 Telegraph Bingham Farms, MI 4802

MINNESOTA MINING & MANUFACTURING COMPANY, a/k/a 3M COMPANY,

Corporation Service Company 801 Adlai Stevenson Drive Springfield, IL 62703

MUELLER STEAM SPECIALTY CO., INC.,

1491 NC Hwy 20 W St. Pauls, NC 28384

NASH ENGINEERING COMPANY (THE),

United States Corporation Company (CT) 50 Weston Street Hartford, CT 06120-1537

ROBERTSHAW CONTROLS COMPANY, individually, and as Successor to FULTON SYLPHON COMPANY

1602 Mustang Dr. Maryville, TN 37801

ROCKWELL AUTOMATION, INC., as successor by merger to ALLEN-BRADLEY COMPANY, LLC.

Secretary of State 99 Washington Ave. Albany, NY 12231

SAINT GOBAIN ABRASIVES, INC., Individually and as Successor in Interest to CARBORUNDUM,

CT Corporation 28 Liberty Street New York, NY 10005

SCHNEIDER ELECTRIC USA, INC., f/k/a SQUARE D COMPANY

1415 South Roselle Road Palatine, IL 60067-7399

SPIRAX SARCO, INC

1150 Northpoint Blvd. Blythewood, SC 29016

STRAHMAN VALVES, INC.,

Lehigh Valley Industrial Park VI 2801 Baglyos Circle Bethlehem, PA 18020

TRANE U.S. INC., f/k/a AMERICAN STANDARD INC.

CT Corporation 208 S. La Salle Street, #814 Chicago, IL 60604

UNION CARBIDE CORPORATION

CT Corporation 28 Liberty Street New York, NY 10005

VELAN VALVE CORPORATION

94 Avenue C Williston, VT 05495

WARREN PUMPS LLC,

The Corporation Trust Company 1209 North Orange Street Wilmington, DE 19801

YORK INTERNATIONAL CORPORATION,

CT Corporation 28 Liberty Street New York, NY 10005 FILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM NYSCEF DOC. NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page

INDEX NO. 190258/2019
Page 5 of 17
RECEIVED NYSCEF: 10/08/2019

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

ARNOLD PRITT and RUTH ANN PRITT,

Plaintiffs,

-against-

AERCO INTERNATIONAL, INC., ALFA LAVAL, INC., ARMSTRONG INTERNATIONAL, INC., ATWOOD & MORRILL COMPANY, AURORA PUMP COMPANY, BMCE INC.,

f/k/a UNITED CENTRIFUGAL PUMP, BORG-WARNER MORSE TEC LLC,

BRIGGS & STRATTON CORP.,

BW/IP INC., AND ITS WHOLLY OWNED SUBSIDIARIES,

BYRON JACKSON PUMPS,

CARRIER CORPORATION,

DAP, INC.,

EATON CORPORATION, as successor in interest to CUTLER-HAMMER, INC.,

ELECTROLUX HOME PRODUCTS, INC.,

individually, and as successor to Tappan and Copes-Vulcan,

FLOWSERVE US, INC.,

solely as Successor to Rockwell Manufacturing Company, Edward Valve, Inc., Durco Pumps, Durametallic, and Nordstrom Valves, Inc.

FMC CORPORATION, individually,

and as successor to CHICAGO PUMP COMPANY,

NORTHERN PUMP COMPANY,

and PEERLESS PUMP COMPANY,

FORT KENT HOLDINGS, INC.,

f/k/a DUNHAM-BUSH, INC.,

GARDNER DENVER, INC.,

GOOD YEAR CANADA, INC.,

GOODYEAR TIRE & RUBBER COMPANY (THE),

GOULD ELECTRONICS, INC.,

GOULDS PUMPS, INC.,

GRINNELL LLC,

HONEYWELL INTERNATIONAL, INC.,

f/k/a ALLIED SIGNAL, INC. / BENDIX,

IMO INDUSTRIES, INC.,

INGERSOLL-RAND COMPANY,

ITT CORPORATION, individually,

and as successor in interest to BELL & GOSSETT, and as successor in interest to HOFFMAN SPECIALTY,

JOHN CRANE, INC.,

Index No.:

Date Filed: October 8, 2019

Plaintiff Designates **NEW YORK**County as the Place of
Trial

The Basis of Venue is Plaintiff's Place of Exposure

VERIFIED COMPLAINT

TILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

YSCEF DOC. NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page 6 of 17

RECEIVED NYSCEF: 10/08/2019

KOHLER CO., LAMONS GASKET COMPANY, McCORD CORPORATION, MINNESOTA MINING & MANUFACTURING COMPANY. a/k/a 3M COMPANY. MUELLER STEAM SPECIALTY CO., INC.; NASH ENGINEERING COMPANY (THE), ROBERTSHAW CONTROLS COMPANY, Individually, and as successor to FULTON SYLPHON COMPANY, ROCKWELL AUTOMATION, INC., as successor by merger to ALLEN-BRADLEY COMPANY, LLC, SAINT GOBAIN ABRASIVES, INC., Individually and as Successor in Interest to CARBORUNDUM, SCHNEIDER ELECTRIC USA, INC., formerly known as SQUARE D COMPANY, SPIRAX SARCO, INC. individually and as successor to SARCO COMPANY. STRAHMAN VALVES, INC., TRANE U.S. INC., f/k/a AMERICAN STANDARD INC., UNION CARBIDE CORPORATION, VELAN VALVE CORPORATION. WARREN PUMPS LLC., YORK INTERNATIONAL CORPORATION, as Successor in Interest to YORK CORPORATION,

	Defendants.
	X
To the above-named Defendant((s)

Plaintiff, ARNOLD PRITT and RUTH ANN PRITT, by their attorneys, MEIROWITZ & WASSERBERG, LLP, for their **verified complaint** respectfully allege:

- 1. Plaintiff, ARNOLD PRITT was diagnosed with Mesothelioma.
- 2. Defendant AERCO INTERNATIONAL, INC., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 3. Defendant ALFA LAVAL, INC., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

4. Defendant ARMSTRONG INTERNATIONAL, INC., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

- 5. Defendant ATWOOD & MORRILL COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 6. Defendant AURORA PUMP COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 7. Defendant BMCE INC., f/k/a UNITED CENTRIFUGAL PUMP was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 8. Defendant BORG-WARNER MORSE TEC LLC, was and still is a duly organized domestic corporation doing business in the State of New York.
- 9. Defendant BRIGGS & STRATTON CORP., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 10. Defendant BW/IP., AND ITS WHOLLY OWNED SUBSIDIARY BYRON

 JACKSON PUMPS, was and still is a corporation doing business and/or transacting business in
 the State of New York and should have expected its acts to have consequences within the State
 of New York.

VILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

VILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

VILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

VILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

11. Defendant CARRIER CORPORATION, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

- 12. Defendant DAP INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 13. Defendant EATON CORPORATION, as successor in interest to CUTLER-HAMMER, INC., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 14. Defendant ELECTROLUX HOME PRODUCTS, INC., individually, and as successor to Tappan and Copes-Vulcan, was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 15. Defendant FLOWSERVE US, INC., solely as Successor to Rockwell

 Manufacturing Company, Edward Valve, Inc., Durco Pumps, Durametallic, and Nordstrom

 Valves, Inc., was and still is a corporation doing business and/or transacting business in the State

 of New York and should have expected its acts to have consequences within the State of New

 York.
- 16. Defendant FMC CORPORATION, individually, and as successor to CHICAGO PUMP COMPANY, NORTHERN PUMP COMPANY, and PEERLESS PUMP COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

VILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

VECTE DOG NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page 9.0f 17.

17. Defendant FORT KENT HOLDINGS, INC., f/k/a DUNHAM-BUSH INC., was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.

- 18. Defendant GARDNER DENVER, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 19. Defendant GOODYEAR CANADA, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 20. Defendant GOODYEAR TIRE & RUBBER COMPANY (THE), was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 21. Defendant GOULDS ELECTRONICS, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 22. Defendant GOULDS PUMPS, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 23. Defendant GRINNELL LLC, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

24. Defendant HONEYWELL INTERNATIONAL, INC., f/k/a ALLIED SIGNAL, INC. / BENDIX, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

- 25. Defendant IMO INDUSTRIES, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 26. Defendant INGERSOLL RAND COMPANY, was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 27. Defendant ITT CORPORATION, individually, and as successor in interest to BELL & GOSSETT, and as successor in interest to HOFFMAN SPECIALTY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 28. Defendant JOHN CRANE, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 29. Defendant KOHLER CO., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

FILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019

OUR PROPERTY OF 17 PAGE 11/18/19 Page 11/08 17 PAGE 11/18/19 PAGE 11/1

30. Defendant LAMONS GASKET COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

- 31. Defendant McCORD CORPORATION, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 32. Defendant MINNESOTA MINING & MANUFACTURING COMPANY, a/k/a 3M COMPANY, was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 33. Defendant MUELLER STEAM SPECIALTIES, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 34. Defendant NASH ENGINEERING COMPANY (THE), was and still is a duly organized corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 35. Defendant ROBERTSHAW CONTROLS COMPANY, Individually and as Successor to FULTON SYLPHON COMPANY, was and still is a duly organized foreign corporation doing business and/or transacting business in the State of New York and/or should have expected its acts to have consequences within the State of New York.
- 36. Defendant ROCKWELL AUTOMATION, INC., as successor by merger to ALLENBRADLEY COMPANY, LLC, was and still is a corporation doing business and/or

INDEX NO. 190258/2019

transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

- 37. Defendant SAINT GOBAIN ABRASIVES, INC., Individually and as Successor in Interest to CARBORUNDUM, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 38. Defendant SCHNEIDER ELECTRIC USA, INC., formerly known as SQUARE D COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 39. Defendant SPIRAX SARCO, INC. individually and as successor to SARCO COMPANY, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 40. Defendant STRAHMAN VALVES, INC., was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.
- 41. Defendant TRANE U.S. INC., f/k/a AMERICAN STANDARD, INC., was and still is a duly organized domestic corporation doing business in the State of New York.
- 42. Defendant UNION CARBIDE CORPORATION, was and still is a corporation doing business and/or transacting business in the State of New York and should have expected its acts to have consequences within the State of New York.

INDEX NO. 190258/2019 Page 13 of 17 RECEIVED NYSCEF: 10/08/2019

43. Defendant VELAN VALVE CORPORATION, was and still is a duly organized

corporation doing business and/or transacting business in the State of New York and/or should

have expected its acts to have consequences within the State of New York.

44. Defendant WARREN PUMPS LLC, was and still is a corporation doing business

and/or transacting business in the State of New York and should have expected its acts to have

consequences within the State of New York.

45. Defendant YORK INTERNATIONAL CORPORATION, as Successor in Interest

to YORK CORPORATION, was and still is a corporation doing business and/or transacting

business in the State of New York and should have expected its acts to have consequences within

the State of New York.

46. Plaintiff's counsel requested Social Security Records from the Social Security

Administration on October 1, 2019.

47. Plaintiff's counsel uploaded a Social Security Authorization to RecordTrak on

October 7, 2019.

Plaintiff, ARNOLD PRITT and RUTH ANN PRITT, repeats and realleges NYCAL -

MEIROWITZ & WASSERBERG, LLP's STANDARD ASBESTOS COMPLAINT FOR

PERSONAL INJURY No. 1 as if fully incorporated herein as it pertains to the defendants in the

aforementioned caption.

Dated: October 8, 2019

New York, New York

MEIROWITZ & WASSERBERG, LLP

/S/ Daniel Wasserberg

> Daniel Wasserberg 535 Fifth Ave, 23rd Floor New York, New York 10017

(212) 897-1988

INDEX NO. 190258/2019

STATE OF NEW YORK

SS:

COUNTY OF NEW YORK)

The undersigned, an attorney admitted to practice in the Courts of New York State,

shows:

Deponent is an Attorney of the law firm MEIROWITZ & WASSERBERG, LLP,

Counsel for the plaintiff(s) in the within action; deponent has read the foregoing summons and

verified complaint and knows the contents thereof; the same is true to deponent's own

knowledge, except as to the matters therein stated to be alleged on information and belief, and

that as to those matters deponent believes it to be true. This verification is made by deponent

and not by plaintiff(s) because plaintiff(s) resides outside of the County of New York where

plaintiffs' counsel and deponent maintain their office.

Dated: October 8, 2019

New York, New York

|S| Daniel Wasserberg

DANIEL WASSERBERG

14 of 17

FILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page 15 of 17

INDEX NO. 190258/2019 RECEIVED NYSCEF: 10/08/2019

Index No.: SUPREME COURT OF THE STATE OF NEW YORK **COUNTY OF NEW YORK** ARNOLD PRITT and RUTH ANN PRITT, Plaintiffs, -against-AERCO INTERNATIONAL, INC., et. al., Defendants. **SUMMONS and COMPLAINT** MEIROWITZ & WASSERBERG, LLP Attorneys for PLAINTIFFS 535 Fifth Ave, 23rd Floor New York, NY 10017 212-897-1988 To Attorney(s) for Service of a copy of the within is hereby admitted. Dated, October 8, 2019 Attorney(s) for ARNOLD PRITT and RUTH ANN PRITT

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

-----X Index No.:

ARNOLD PRITT and RUTH ANN PRITT,

Date Filed: 10/8/2019

FULL CAPTION

RIDER

Plaintiffs,

-against-

AERCO INTERNATIONAL, INC.,

ALFA LAVAL, INC.,

ARMSTRONG INTERNATIONAL, INC.,

ATWOOD & MORRILL COMPANY,

AURORA PUMP COMPANY,

BMCE INC.,

f/k/a UNITED CENTRIFUGAL PUMP,

BORG-WARNER MORSE TEC LLC,

BRIGGS & STRATTON CORP.,

BW/IP INC., AND ITS WHOLLY OWNED SUBSIDIARIES,

BYRON JACKSON PUMPS,

CARRIER CORPORATION,

DAP, INC.,

EATON CORPORATION, as successor in interest to

CUTLER-HAMMER, INC.,

ELECTROLUX HOME PRODUCTS, INC.,

individually, and as successor to Tappan and Copes-Vulcan,

FLOWSERVE US, INC.,

solely as Successor to Rockwell Manufacturing Company,

Edward Valve, Inc., Durco Pumps, Durametallic, and Nordstrom

Valves, Inc.

FMC CORPORATION, individually,

and as successor to CHICAGO PUMP COMPANY,

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and PEERLESS PUMP COMPANY,

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f/k/a DUNHAM-BUSH, INC.,

GARDNER DENVER, INC.,

GOOD YEAR CANADA, INC.,

GOODYEAR TIRE & RUBBER COMPANY (THE),

GOULD ELECTRONICS, INC.,

GOULDS PUMPS, INC.,

GRINNELL LLC,

HONEYWELL INTERNATIONAL, INC.,

f/k/a ALLIED SIGNAL, INC. / BENDIX,

IMO INDUSTRIES, INC.,

INGERSOLL-RAND COMPANY,

ITT CORPORATION, individually,

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successor in interest to HOFFMAN SPECIALTY,

JOHN CRANE, INC.,

KOHLER CO.,

LAMONS GASKET COMPANY,

McCORD CORPORATION.

MINNESOTA MINING & MANUFACTURING COMPANY,

16 of 17

FILED: NEW YORK COUNTY CLERK 10/08/2019 04:40 PM INDEX NO. 190258/2019 NYSCEF DOC. NO. 1 Case 1:19-cv-10651-KPF Document 1-2 Filed 11/18/19 Page 17 of 17 NYSCEF: 10/08/2019

a/k/a 3M COMPANY, MUELLER STEAM SPECIALTY CO., INC.; NASH ENGINEERING COMPANY (THE), ROBERTSHAW CONTROLS COMPANY, Individually, and as successor to FULTON SYLPHON COMPANY, ROCKWELL AUTOMATION, INC., as successor by merger to ALLEN-BRADLEY COMPANY, LLC, SAINT GOBAIN ABRASIVES, INC., Individually and as Successor in Interest to CARBORUNDUM, SCHNEIDER ELECTRIC USA, INC., formerly known as SQUARE D COMPANY, SPIRAX SARCO, INC. individually and as successor to SARCO COMPANY, STRAHMAN VALVES, INC., TRANE U.S. INC., f/k/a AMERICAN STANDARD INC., UNION CARBIDE CORPORATION, VELAN VALVE CORPORATION, WARREN PUMPS LLC.. YORK INTERNATIONAL CORPORATION, as Successor in Interest to YORK CORPORATION,

17 of 17